

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(GREENVILLE DIVISION)

EDEN ROGERS,  
ET.AL.

\_\_\_\_\_  
Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES,  
ET.AL

\_\_\_\_\_  
Defendants.

)  
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)  
) Case No. 6:19-cv-01567-TMC  
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**Motion  
in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Leslie J. Cooper be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- ☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☐ does not intend to oppose
- X Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):
- ☐ No appearances have been entered. \_\_\_\_\_
- ☐ No duty of consultation is required because the opposing party is proceeding pro se.

\_ACLU of South Carolina

\_P.O. Box 20998\_\_\_\_\_

\_Charleston, SC 29413\_\_\_\_\_

843-282-7953\_\_\_\_\_

sdunn@aclusc.org\_\_\_\_\_

Susan K. Dunn (Federal Bar #647)

Name of Local Counsel

\_s/ Susan K. Dunn\_\_\_\_\_

Signature of Local Counsel

Local Counsel for the Plaintiffs